

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

CHELSEA GILLIAM, *et al.*,

*

Plaintiffs,

*

v.

*

Civil Action No. RDB-23-01047

DEPARTMENT OF PUBLIC SAFETY
AND CORRECTIONAL SERVICES, *et al.*,

*

*

Defendants.

* * * * *

**CHLOE GREY’S MOTION TO ENFORCE TEMPORARY
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

Plaintiff Chloe Grey, by her undersigned counsel, pursuant to Federal Rule of Civil Procedure 65(a), 42 U.S.C. § 1983, 42 U.S.C. § 12188(a)(1), moves the Court to enforce the Court’s earlier temporary restraining order and preliminary injunction against Defendants Department of Public Safety and Correctional Services, Carolyn Scruggs, Orlando Johnson, Kimberly Stewart, Sharon Baucom, April Peterson, David Wolinski, and Michele Gardner, from violating the Eighth and Fourteenth Amendments to the U.S. Constitution, Title II of the Americans with Disabilities Act, 42 U.S.C. §§ 12131-12134, and Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794. Plaintiff asks that this Court require Defendants to provide Ms. Grey with a facial hair inhibitor cream, and to determine that, based on the only legitimate factors cited in the DPSCS housing assessment, Ms. Grey should be housed in a women’s facility. The grounds for this motion are set forth in the attached memorandum of law and accompanying exhibits.

Plaintiff asks that, in any hearing, she be permitted to testify by video pursuant to 41 USC § 1997e(f) (“To the extent practicable, in any action brought with respect to prison

conditions in Federal court pursuant to section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility, pretrial proceedings in which the prisoner's participation is required or permitted shall be conducted by telephone, video conference, or other telecommunications technology without removing the prisoner from the facility in which the prisoner is confined.”)

WHEREFORE, Plaintiff requests that her Motion be granted and that the Court enforce the temporary restraining order and preliminary injunction against Defendants.

Dated: February 23, 2024

Respectfully submitted,

/s/

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